

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

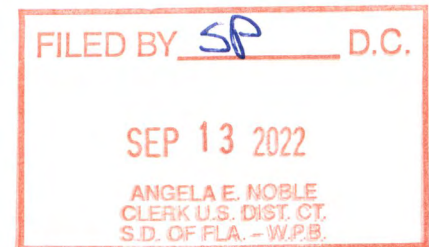
CASE NO. 22-cr-80146-Cannon/Reinhart
8 U.S.C. § 1324(a)(2)(B)(ii)
18 U.S.C. § 982(a)(6)

UNITED STATES OF AMERICA

v.

MAHANDRA SOOKRAM,

Defendant.



INDICTMENT

The Grand Jury charges that:

COUNTS 1-6

On or about August 31, 2022, within the Special Maritime and Territorial Jurisdiction of the United States, and elsewhere, with Palm Beach County, in the Southern District of Florida, being the district to which the offender was first brought, the defendant,

MAHANDRA SOOKRAM,

did knowingly bring to the United States aliens by any manner whatsoever, as set forth in Counts 1 through 6 below, knowing and in reckless disregard of the fact that such aliens had not received prior official authorization to come to, enter, and reside in the United States, and regardless of any official action which may later be taken with respect to such aliens, for the purpose of commercial advantage and private financial gain:

<u>Count</u>	<u>Alien</u>
1	D.B.
2	C.D.

3	S.G.
4	V.L.
5	R.R.
6	D.S.

All in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii) and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendant, **MAHANDRA SOOKRAM**, has an interest.

2. Upon conviction of a violation of Title 8, United States Code, Section 1324, as alleged in this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(6):

- a. any conveyance, including any vessel, vehicle, or aircraft, used in the commission of such offense;
- b. any property, real or personal, that constitutes, or is derived from, or is traceable to any proceeds obtained, directly or indirectly, from the commission of such offense; and
- c. any property, real or personal, that was used to facilitate, or intended to be used to facilitate, the commission of such offense.

All pursuant to Title 18, United States Code, Section 982(a)(6) and the procedures set

forth in Title 21, United States Code, Section 853, as incorporated by Title 18, United States Code, Section 982(b)(1).

A TRUE BILL

A handwritten signature in blue ink, reading "Anthony W. Sacosta for".

JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY

FOREPERSON

A handwritten signature in blue ink, appearing to be "Lara Treinis Gatz".

LARA TREINIS GATZ
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA
v.

CASE NO.: 22-cr-80146-Cannon/Reinhart

MAHANDRA SOOKRAM,

CERTIFICATE OF TRIAL ATTORNEY*

Superseding Case Information:

Court Division (select one)

- ☐ Miami ☐ Key West ☐ FTP
☐ FTL ☒ WPB

New Defendant(s) (Yes or No)

Number of New Defendants

Total number of New Counts

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) **NO**
List language and/or dialect:
4. This case will take **FIVE** days for the parties to try.
5. Please check appropriate category and type of offense listed below:
(Check only one) (Check only one)
I ☒ 0 to 5 days ☐ Petty
II ☐ 6 to 10 days ☐ Minor
III ☐ 11 to 20 days ☐ Misdemeanor
IV ☐ 21 to 60 days ☒ Felony
V ☐ 61 days and over
6. Has this case been previously filed in this District Court? (Yes or No) **NO**
If yes, Judge Case No.
7. Has a complaint been filed in this matter? (Yes or No) **YES**
If yes, Magistrate Case No. **22-MJ-8395**
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) **NO**
If yes, Judge Case No.
9. Defendant(s) in federal custody as of **August 31, 2022**
10. Defendant(s) in state custody as of
11. Rule 20 from the District of
12. Is this a potential death penalty case? (Yes or No) **NO**
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard? (Yes or No) **NO**
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss? (Yes or No) **NO**

By: Lara Treinis Gatz
Lara Treinis Gatz
Assistant United States Attorney
Court ID No. A5502857

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: MAHANDRA SOOKRAM

Case No: 22-cr-80146-Cannon/Reinhart

Bringing Aliens into the United States Title 8, United States Code, § 1324(a)(2)(B)(ii)

Counts One and Two

- * Max. Term of Imprisonment: 10 Years
- * Mandatory Min. Term of Imprisonment (if applicable): 3 years
- * Max. Supervised Release: 3 years
- * Max. Fine: \$250,000

Bringing Aliens into the United States Title 8, United States Code, § 1324(a)(2)(B)(ii)

Counts Three through Six

- * Max. Term of Imprisonment: 15 Years
- * Mandatory Min. Term of Imprisonment (if applicable): 5 years
- * Max. Supervised Release: 3 years
- * Max. Fine: \$250,000

*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.